

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CATHERINE GAUJACQ)
)
)
Plaintiff,)
)
)
v.)

No. 1:05CV0969 (JGP)

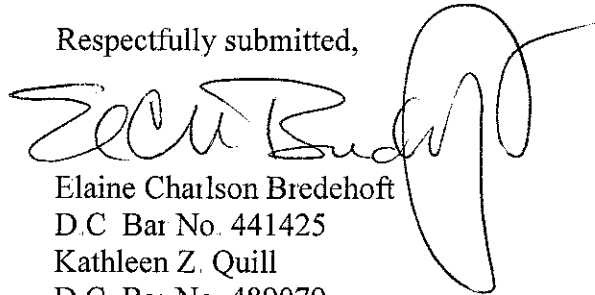
ELECTRICITE DE FRANCE)
INTERNATIONAL NORTH AMERICA,)
INC., et al.)
)
)
Defendants)
_____)

PLAINTIFF'S MOTION TO RESCHEDULE TRIAL

Plaintiff CATHERINE GAUJACQ ("Ms. Gaujacq"), by counsel, hereby moves this Court to reschedule trial by jury in this matter, which is currently scheduled to begin April 2, 2007. The grounds for this motion are set forth in the accompanying Memorandum.

January 10, 2006

Respectfully submitted,



Elaine Charlson Bredehoff
D.C. Bar No. 441425
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Counsel for Plaintiff,
Catherine L. Gaujacq

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CATHERINE GAUJACQ

Plaintiff,

v.

ELECTRICITE DE FRANCE
INTERNATIONAL NORTH AMERICA,
INC., et al.

Defendants.

No. 1:05CV0969 (JGP)

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF PLAINTIFF'S
MOTION TO RESCHEDULE TRIAL**

Plaintiff CATHERINE GAUJACQ ("Ms. Gaujacq"), by counsel, hereby moves this Court to reschedule the trial by jury in this matter to a date in early March, 2007, or earlier, from the current trial date of April 7, 2007.

LCvR 7.1(m) CERTIFICATION

Counsel conferred with Defendants' counsel regarding this motion. Counsel for EDFINA stated that they consented, counsel for EDF stated that they would get an answer to counsel by the end of the week of December 19, 2005, but have not responded yet, and counsel for Mr. Nadal has simply not responded to any contact on the issue.

ARGUMENT

On December 7, 2005, counsel for the Plaintiff, Ms. Gaujacq, received the Fairfax County Public Schools calendar for the school year 2006-07. Attachment 1. Upon reviewing the vacation dates, counsel learned that the spring break vacation is scheduled for April 2-6, the first week of the trial scheduled in this case. Plaintiff's counsel has two school-aged children, and the spring break is an important time in which counsel's entire

family takes off and travels somewhere together. As the children become older, that time is even more important to Plaintiff's counsel. When this trial date was set, the Court indicated that it could be changed. Plaintiff's counsel believes this is a good reason to justify changing the trial date.

On December 7, 2005, the same day counsel received the school calendar, counsel sent an email to all counsel, requesting their approval to change the trial date. Attachment 2.

Defendants did not respond to Plaintiff's counsel's request. On December 19, 2005, Plaintiff's counsel sent another email, reminding them of the earlier email, and asking what Plaintiff's counsel should represent to the Court with respect to their consent. Attachment 3.

Counsel for EDF and EDFINA responded on December 20, 2005, indicating that EDFINA had no problem with rescheduling the trial, but that counsel still needed to confirm with EDF any scheduling conflicts. Attachment 4.

Since December 20, 2005, counsel for EDF has not provided any further information. Counsel for Mr. Nadal has not responded to any of the requests.

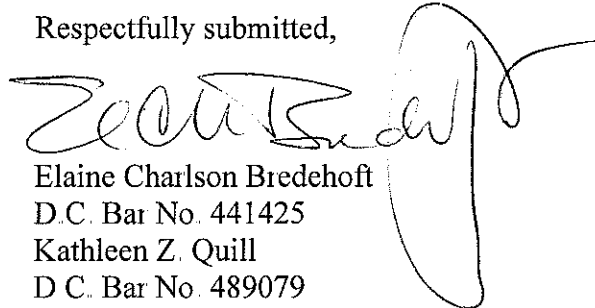
Given the estimate of two weeks for the trial, Plaintiff requests a date in early March, or even earlier, to ensure that the trial does not interfere with the school holiday. The parties, when setting the trial date, had indicated that they wanted it to be over before the summer for a variety of reasons. Moving the trial date up best ensures that the trial will be held prior to the school holiday and will not run into the summer.

CONCLUSION

Plaintiff respectfully requests this Court grant the motion to change the trial date, to a date in early March, 2007 or earlier.

January 10, 2006

Respectfully submitted,



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